

IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF LOUISIANA

VERONICA ALEXANDER
PLAINTIFF

VS.

MEDICAL CITY OF PLANO, ET AL,
DEFENDANTS

11-2407
SECT. L MAG. 2

CIVIL ACTION NUMBER: _____

COMPLAINT BASED UPON PERSONAL INJURY.

1. THIS IS A CIVIL ACTION SEEKING DAMAGES AGAINST THE DEFENDANT FOR
COMMITTING PERSONAL HARM AND INJURY IN AN UNSAFE MEDICAL
ENVIRONMENT WHICH CONTRIBUTED TO MEDICAL MALPRACTICE AGAINST HER
HUSBAND, CHARLES EDWARD JACKSON.
2. THE COURT HAS JURISDICTION SEVERE VIOLATIONS OF MEDICAL
MALPRACTICE FOR NOT PROVIDING A SAFE MEDICAL ENVIRONMENT FOR
HUSBAND CHARLES EDWARD JACKSON
3. THE PLAINTIFF, RESIDES AT:

VERONICA ALEXANDER
1114 BRISTOL TRIAL
DESOTO, TEXAS 75115

4. DEFENDANTS ARE NUMEROUS AND THEIR ADDRESSES ARE:

1
TENDERED FOR FILING

COMPLAINT FOR FEDERAL COURT

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THE MEDICAL CITY OF PLANO
3901 WEST 15TH IST
PLANO, TEXAS 75075

5. DEFENDANTS AIG IS AN INSURANCE CONGLOMERATE AND A SUBSIDIARY
AND THEIR ADDRESS IS:

*METHODIST RICHARDSON MEDICAL CENTER
2321 EAST PRESIDENT GEORGE BUSH HWY
RICHARDSON, TEXAS 75082*

6. DEFENDANT DR.NAIRA VABAIAAN IS A MEDICAL DOCTOR AND THEIR ADDRESS IS:

*DR. NAIRA VABAIAAN
9128 W. PARKER RD-SUITE 1200
PLANO, TEXAS 75093*

COUNT NUMBER 1

6. THE DEFENDANT IN AN ARBITRARY AND CAPRICIOUS WAY HAVE
CONTRIBUTED TO THE PERSONAL INJURIES OF THE PLAINTIFF BY NOT PROVIDING A
SAFE AND MEDICAL CARE ENVIRONMENT FOR HUSBAND CHARLES EDWARD
JACKSON

COUNT NUMBER 2

7. THE DEFENDANT IS IN SERIOUS VIOLATIONS OF STATE AND FEDERAL LAWS
CONCERNING MEDICAL MALPRACTICE.

COUNT NUMBER 3

8. THE DEFENDANT DELIBERATELY GROSS NEGLIGENCE IN NOT PROVIDING A

**SAFE AND PROPER CARE MEDICAL ENVIRONMENT FOR HUSBAND CHARLES
EDWARD JACKSON.**

COUNT NUMBER 4

**9. THE DEFENDANT TOOK ADVANTAGE OF THE PLAINTIFF BECAUSE IS BLACK AND
REFUSED TO PROVED HIM AMPLE ASSISTANCE WITH HIS HEALTH INJURIES
WHICH WERE A RESULT OF THERE GROSS NEGLIGENCE IN NOT PROVIDING A
SAFE AND MEDICAL CARE ENVIRONMENT FOR HUSBAND CHARLES EDWARD
JACKSON.**

COUNT NUMBER 5

**10. THE DEFENDANT HAS SHOWN THAT IT HAS NO INTENTIONS OF PROEPRLY
TAKING CARE OF THE PLAINTIFF HUSBAND CHARLES EDWARD JACKSON AND HIS
RELATED INJURIES AND HAVE CAUSED THE PLAINTIFF HUSBAND SEVERE MENTAL
AND PHYSICAL STRESS IN THAT HER HUSBAND MAY NEVER BE ABLE TO PROPERLY
WORK AGAIN.**

TRIAL BY JURY :

JURY TRIAL REQUEST.

RELIEF REQUESTED

PLAINTIFF SEEKS JUDGMENT AS FOLLOWS:

A. DAMAGES IN THE AMOUNT OF 50,000,000 FOR THE MENTAL STRESS AND

PHYSICAL PAIN WHICH THIS SITUATION HAS CAUSED HIM.

RESPECTFULLY SUBMITTED:

A handwritten signature in cursive script, reading "Veronica Alexander", written over a horizontal line.

VERONICA ALEXANDER, PRO SE

1114 BRISTOL TRAIL

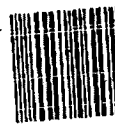
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